

U.S. Department of the Interior
Bureau of Land Management
Little Snake Field Office
455 Emerson Street
Craig, CO 81625

DOCUMENTATION OF LAND USE PLAN CONFORMANCE AND NEPA ADEQUACY

NUMBER: DOI-BLM-CO-N010-2014-0061-DNA

PROJECT NAME: Holland Thinning

LEGAL DESCRIPTION:

COUNTY AND GENERAL LOCATION: The project area is located on Douglas Mountain, 5.5 miles west of Greystone, CO in Moffat County.

T7N R101W sections 5 and 6
T8N R101W sections 31 and 32

197 acres BLM
48 acres private
245 acres total

APPLICANT: BLM

A. Describe the Proposed Action

The project area consists of primarily ponderosa pine with encroaching pinyon pine and Utah juniper. Smaller areas of mountain mahogany, serviceberry, and sagebrush are also present. The objective is to reduce the chance of high intensity fires that would cause significant ponderosa pine mortality and threaten a nearby residence. This would be accomplished by removing trees and shrubs that provide a path for fire to travel up into taller ponderosa pine (ladder fuels) and limbing mature ponderosa trees to a height of 6'. The resultant fire behavior would be a lower intensity surface fire rather than a high intensity crown fire. All design features and mitigation specified in environmental analysis DOI-BLM-CO-N010-2013-0056-EA will be followed.

Pinyon or juniper trees less than 8' tall, and those trees that have ladder fuel potential, and brush would be cut with chainsaws. No large ponderosa trees would be cut, and only selected smaller trees would be cut. Tree limbs within 6' of the ground would be cut from larger trees to eliminate ladder fuels which provide a path for fire to burn up into the crown of a tree. In areas where diseased trees occur, all diseased trees, regardless of size, would be cut down, limbed, bucked and piled for later burning. Slash piles would be burned after sufficient drying has occurred (3+ months) in order to get 90% consumption. Burning would be conducted when snow is present in order to prevent fire spread beyond the piles.

Slash pile burning must be carried out in accordance with the Interagency Prescribed Fire Planning and Implementation Procedures Guide. This guide requires that a prescribed burn plan be completed that describes exactly how and under what conditions prescribed burning would occur in order to meet stated resource and fire management goals and objectives. The prescribed fire would also be conducted in accordance with the State of Colorado Smoke Management Plan and MOU, and would be regulated under Colorado Department of Public Health and Environment, Air Pollution Control Division. The Air Pollution Control Division would issue an open burning permit, which specifies smoke dispersal conditions and other stipulations under which burning may occur.

B. Land Use Plan (LUP) Conformance

LUP Name: Little Snake Record of Decision and Approved Resource Management Plan (RMP)

Date Approved: October, 2011

Final RMP/EIS, August, 2010

Draft RMP/EIS, January, 2007

The Proposed Action is in conformance with the LUP because it is specifically provided for in the following LUP goals, objectives, and management decisions:

Section/Page:

Wildland Fire Management - page RMP-27:

Give first priority to protection of life or property. Objectives for achieving this goal include:

- Identify and reduce hazardous fuels, with an emphasis on urban interface areas. Create an integrated approach to fire and resource management to meet land health standards. Objectives for achieving this goal include:
- Reduce fire hazards in ecosystems and restore ecological community functions.
- Use fire and allow it to protect, maintain, and enhance resources.
- Use fire and allow it to function in its ecological role when appropriate for the site and situation.

Vegetation – page RMP-15:

Collaborate with stakeholders and resource users in providing an array of habitats, suitably distributed across the landscape, that support biodiversity and viable populations of native plant and animal species. Objectives for achieving this goal include:

- Manage for a diversity of seral stages within plant communities.
- Manage for connections between varieties of plant communities on a landscape scale.

- Restore natural disturbance regimes, such as fire, and use vegetation treatments to accomplish biodiversity

Manage for healthy forest and woodland communities. Objectives for achieving this goal include:

- Manage forests and woodlands to improve forest resiliency to disturbances from insects, disease, and wildfires; restore habitats for special status species; and produce a sustainable supply of forest products.
- Maintain the appropriate species diversity and age-class distribution for forest and woodland communities that are resilient to disturbances.

C. Identify applicable NEPA documents and other related documents that cover the proposed action.

DOI-BLM-CO-N010-2013-0056-EA, Douglas Mountain Fuels Treatment.

The Federal Land Policy and Management Act of 1976, as Amended (43 USC 1752)

Federal Land Assistance, Management and Assistance Act of 2009.

Northwest Colorado Fire Management Program Fire Management Plan, 2014

D. NEPA Adequacy Criteria

1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed? Is the current proposed action located at a site specifically analyzed in an existing document? Yes. The current proposed action is part of the proposed action in the previously approved Environmental Assessment Record, Little Snake Field Office, LSFO Juniper Encroachment Treatment, DOI-BLM-CO-N010-2013-0056-EA.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, and resource values? Yes. The Environmental Assessment Record for DOI-BLM-CO-N010-2013-0056-EA analyzed the environmental impacts of the Proposed Action. The Proposed Action in the DNA is a part of the listed activities covered in the EA. The current environmental concerns, interests, and resource values are essentially the same as those analyzed in the EA.

3. Is the existing analysis valid in light of any new information or circumstances? Yes. The Proposed Action would have no disproportionate impacts on minority populations or low income communities per Executive Order (EO) 12898 and would not adversely impact migratory birds per EO 13186.

Subject to WO-IM 2011-154 and in accordance with BLM policy, the proposed project area lies within a polygon adjacent to the Peterson Draw WSA. This area was evaluated for having the potential for wilderness characteristics and suitability and it was determined that the area did not meet the naturalness criteria due to the presence of a BLM maintained road (#1669) bisecting the polygon.

4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action? Yes. The Environmental Assessment Record DOI-BLM-CO-N010-2013-0056-EA methodology and analytical approach are appropriate to this Proposed Action.

5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Does the existing NEPA document analyze site-specific impacts related to the current proposed action? Yes. Direct and indirect impacts of the Proposed Action are unchanged from those identified in the existing NEPA documents. DOI-BLM-CO-N010-2013-0056-EA analyzed the direct, indirect, and site-specific impacts of the area covered under this present Proposed Action.

6. Can you conclude without additional analysis or information that the cumulative impacts that would result from implementation of the current proposed action substantially unchanged from those analyzed in the existing NEPA document(s)? Yes. The cumulative impacts that would result from the implementation of the Proposed Action would remain unchanged from those identified in the existing environmental assessment DOI-BLM-CO-N010-2013-0056-EA. No additional activities have been implemented that would change the impacts resulting from the Proposed Action.

7. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action? Yes. Public outreach through scoping and involvement of the public and other agencies occurred during the development of the EA.

E. Interdisciplinary Analysis:

Title	Resource	Date
Ecologist	Air Quality, Floodplains Prime/Unique Farmlands, Soils, Water Quality – Surface, Wetlands/Riparian Zones	DB 11/10/14
Archaeologist	Cultural Resources, Native American Concerns	BN 10/24/14
Realty Specialist	Environmental Justice	LM 9/29/14
Project Lead	Hazardous Materials	DB 9/15/14
Rangeland Management Spec.	Invasive Non-native Species	CR 9/29/14
Rangeland Management Spec.	Sensitive Plants, T&E Plant	AH 10/6/14
Wildlife Biologist	T&E Animals	SW 10/06/14
Geologist	Water Quality - Ground	DB 11/24/14
Recreation Specialist	WSA, W&S Rivers, LWCs, ACECs	DA 9/29/14
Wildlife Biologist	Animal Communities	SW

		10/06/14
Wildlife Biologist	Special Status, T&E Animals	SW 10/06/14
Rangeland Management Spec	Plant Communities	DB 9/15/14
Rangeland Management Spec	Special Status, T&E Plants	AH 10/6/14
Ecologist	Riparian Systems	SW 10/06/14
Ecologist	Water Quality	DB 11/10/14
Ecologist	Upland Soils	DB 9/15/14
Fire Management Spec.	Forestry	DB 9/15/14

Cultural Resources

Federal agencies are mandated by various laws to consider the effect of proposed land use activities on cultural resources (i.e. historic and archaeological sites). The National Environmental Policy Act directs the federal government to preserve important historic and cultural aspects of the national heritage. The National Historic Preservation Act (NHPA) requires federal agencies to take into account the effect of federal undertakings on cultural resources that are eligible for inclusion in the National Register of Historic Places (NRHP). In Colorado, the requirements of the NHPA are implemented under the terms of the Protocol Agreement between the Bureau of Land Management and the State Historic Preservation Officer. An undertaking may be authorized by a BLM field office if it is determined that there will be "no effect" or "no adverse effect" to eligible sites.

The proposed undertaking will have no effect on sites that are eligible to the NRHP. In spring or summer of 2014, a thorough pedestrian "Class III" cultural resource survey was completed for the fuel reduction project area. The work was completed by a BLM archaeological technician working with a volunteer. Six prehistoric isolated finds consisting of waste flakes and projectile points were recorded and determined to be not eligible to the NRHP. The isolated finds need not be avoided by the fuel reduction project.

Native American Concerns

A number of laws direct federal land managing agencies to consider the views of Native Americans as part of the process of making land use decisions. The National Environmental Policy Act mandates that the federal government preserve important historic and cultural aspects of the national heritage. Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies to consult with Native Americans regarding the effect of federal undertakings on sites that may be of cultural or religious importance to Indian people to ensure that tribal values are taken into account to the extent feasible.

Based on available information, the proposed fuels reduction project is not expected to affect sites or areas of concern to Native Americans. In historic times, the Little Snake field area was

inhabited by the Utes and the Shoshone. Sites of concern to the tribes usually include burials, rock art sites, wickiups, and vision quest sites. No sites of the above-mentioned varieties are known within the area to be affected by the proposed project. Also, the project is not located within an area known to be of concern to the tribes. In May of 2013, the Little Snake Field Office sent letters describing federal undertakings planned for upcoming years to the three branches of the Utes and to the Eastern Shoshone. The letters discussed proposed fuel reduction projects. No response to the letters was received. From the above information, it is concluded that the proposed undertaking will not affect sites or areas of concern to Native Americans.

Land Health Assessment

This action has been reviewed for conformance with the BLM's Public Land Health Standards adopted February 12, 1997. This action will not adversely affect achievement of the Public Land Health Standards and should help to improve identified deficiencies. Standards Assessment was conducted in June 2004 by 4 rangeland management specialists, three wildlife biologists, and one soil/water/air specialist.

Conclusion

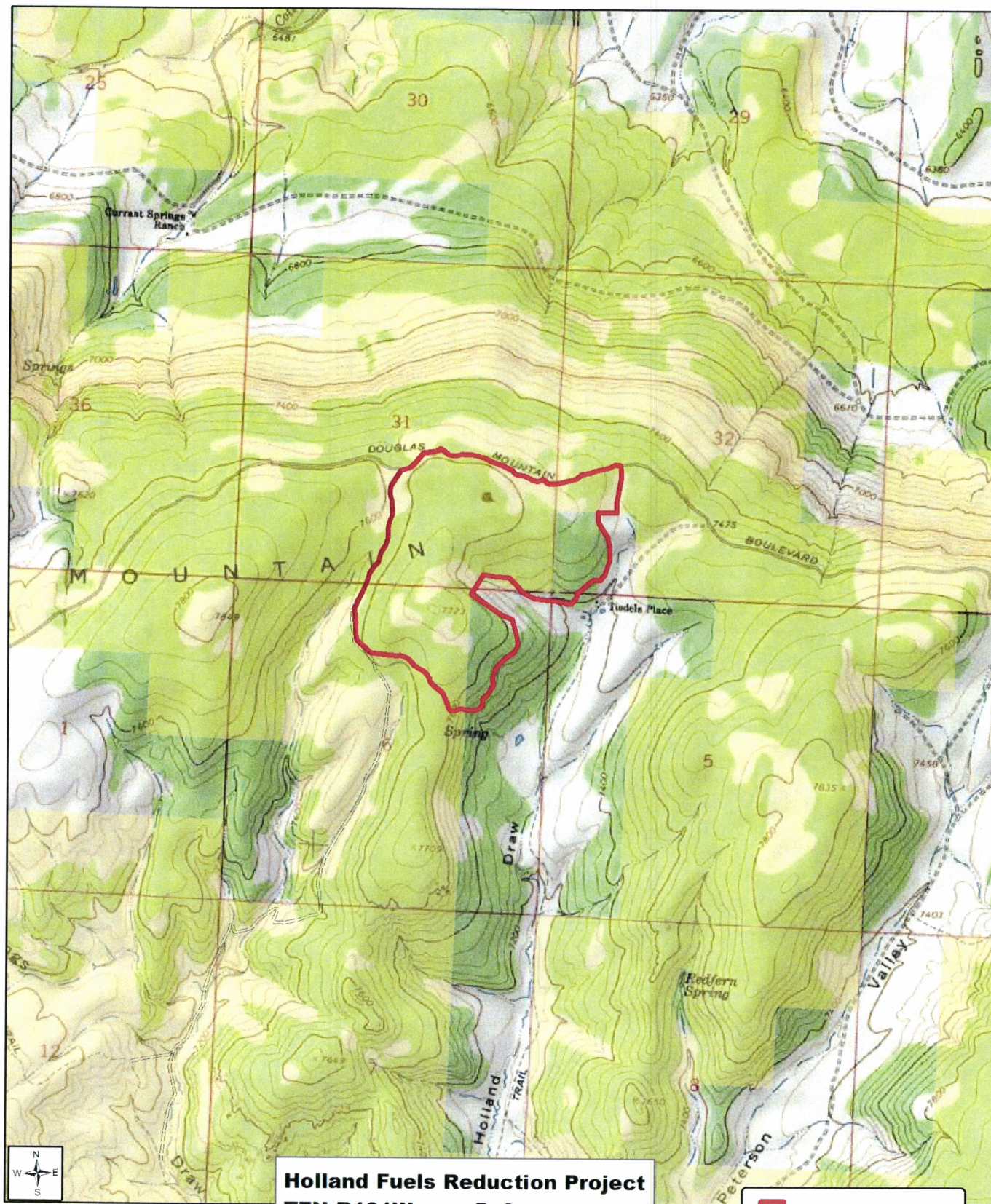
Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA.

Signature of Lead Specialist Dale Beckerman Date 12/10/14

Signature of NEPA Coordinator Kathy McKinstry Date 12/10/14

Signature of the Authorizing Official Tim Wilson Date 1/7/15
Tim Wilson, Associate Field Office Manager

Note: The signed Conclusion on this document is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.



Holland Fuels Reduction Project
T7N R101W sec. 5, 6
245 acres Total
197 acrs BLM, 48 acres Private

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Surface Management Status

Bureau of Land Management

Private

D.B. 5/20/14